

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MICROSOFT CORPORATION, a  
Washington corporation,

Plaintiff,

v.

DOMINIQUE ALEXANDER PIATTI, an  
individual; DOTFREE GROUP S.R.O., a  
Czech limited liability company, and  
ANDREY N. SABELNIKOV, an individual,  
CONTROLLING A COMPUTER BOTNET  
THEREBY INJURING MICROSOFT AND  
ITS CUSTOMERS

Defendants.

Civil Action No: 1:11cv1017 (JCC/IDD)

**MOTION FOR RELEASE AND CANCELLATION OF BOND**

WHEREAS on September 22, 2011, Plaintiff Microsoft Corporation (“Plaintiff”) filed a Bond in the amount of ten thousand dollars (\$10,000) in the above-captioned matter (the “Bond”) [Docket No. 18] as a condition for a Temporary Restraining Order pursuant to this Court’s Order of September 22, 2011 [Docket No. 14], and a Preliminary Injunction pursuant to this Court’s Order of October 12, 2011 [Docket No. 26];

WHEREAS on October 24, 2011, Plaintiff filed a Notice of Voluntary Dismissal of Defendants Dominique Alexander Piatti and dotFree Group s.r.o. [Docket No. 27], which was so ordered by this Court on October 26, 2011 [Docket No. 31];

WHEREAS on August 30, 2012, Plaintiff filed a Notice of Voluntary Dismissal of remaining Defendant Andrey N. Sabelnikov [Docket No. 42], which was so ordered by this Court on September 4, 2012 [Docket No. 43]; and

WHEREAS because this case has been resolved and dismissed against all Defendants,  
Plaintiff respectfully requests the Court order the release and cancellation of the Bond.

Dated: September 12, 2012      Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Christopher M. O'Connell

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